

Comments in Response to Localism Notice of Proposed Rulemaking MB Docket No. 04-233

I, James Suminski, submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Many of the proposals in NPRM, contrary to the FCC's stated objectives, would harm both localism and diversity of viewpoints, while one specific proposal would do more to address both localism and diversity than any other to-date.

The time has come to once again allow humans to communication with humans in the United States and to curtail reliance on impersonal technology. A similar rule was recently passed in Great Britain forcing all radio broadcast facilities to be manned 18 hours a day. No ill affect was noted by any of the facilities in both large and small markets.

Unstaffed operations have proven time and time again to place a barrier to responsiveness to a local community. Unattended operation, even with some safeguards does NOT help stations provide more service through efficiency. It simply makes stations less responsive to local communities and becomes a profit motive for operators. Increased operational costs, is the same smoke screen that lead to initial deregulation. Somehow a "starving" industry came up with billions to create behemoth corporations to replace local operators and remove important training grounds for talent in small and unrated markets. It's time those training grounds were reinstated and local service to those communities restored.

The Commission should reject the proposal that would further limit where broadcasters can locate their main studios. The Commission acted in the public interest when it adopted rules many years ago to permit stations greater flexibility in selecting the location of their main studios, particularly in situations in which a broadcaster operates stations licensed to several nearby communities. If the Commission were to force each station to establish its main studio only in that station's community of license, the result would be that broadcasters -- particularly small market and speciality programming broadcasters -- would have to divert their limited financial resources from supporting and enhancing quality programming to covering additional and unnecessary real estate costs.

The FCC should also jettison proposals forcing stations to give away airtime to community groups. One proposal would even enforce public access requirements, similar to cable PEG channels. Cable has dozens, even hundreds of channels from which it can profit, but smaller market radio and stations serving small specialized audiences do not. Free is not really free to those who struggle every day just to keep the electricity flowing, the programming going, and the local news covered.

All stations must be reminded of their commitment to be keenly attuned to the communities they serve -- it is how they remain in business. But the balance is delicate, and the Commission must take some actions and not take others that will tip the balance so stations cut back on service that is limited already. There is no 'public interest' in service that is both diminished and less diverse. Put back human communication in radio broadcasting while allowing the benefit of most efficient studio location.

Respectfully submitted,

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February 19, 2008
Date

Signature

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